COMMISSION ON STATE EMERGENCY COMMUNICATIONS
THE AUTHORITY ON EMERGENCY COMMUNICATIONS IN TEXAS
333 Guadalupe Street * Suite 2-212 * Austin * Texas 78701-3942

April 21, 2017

Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: PS Docket No. 17-68; *Notice of Ex-Parte*

Dear Ms. Dortch:

On April 19, 2017, staff of the Texas Commission on State Emergency Communications (CSEC), the Bexar Metro 9-1-1 Network (Bexar Metro), and the Texas 9-1-1 Alliance (the Alliance) (collectively, the Texas 9-1-1 Entities) met via conference call with Megan Henry, James Wiley, and Tyler Di Mattia of the Commission's Public Safety and Homeland Security Bureau (PSHSB). Texas 9-1-1 Entities' on the conference call were:

CSEC
- Kelli Merriweather, Executive Director
- Susan Seet, Director of Programs
- Monica Watt, Data Quality Manager
- Vonda Payne, Project/Vendor Manager
- Patrick Tyler, General Counsel

Bexar Metro
- Richard Muscat, Director of Regulatory Affairs
- Brett Schneider, Chief Operations Officer
- Eddie Taylor, Director 9-1-1 Systems

The Alliance
- Jim Goerke, Chief Executive Officer

The purpose of the call was to discuss the above-captioned proceeding regarding AT&T Mobility outages that prevented certain 9-1-1 calls from reaching public safety answering points (PSAPs). Prior to the call, PSHSB sent questions regarding the outage to the Texas 9-1-1 Entities to aide in preparing for the call (see enclosure).

9-1-1 Authority/PSAP Notification

During the call, the Texas 9-1-1 Entities noted the importance of outage notices containing context information (*e.g.*, affected geographic area, affected network, suspected cause, whether a trouble ticket was created) available to the service provider. Absent such information, in particular where the provider with the outage may also be a provider of 9-1-1 network and/or database services, 9-1-1 Authorities and their PSAPs are unable to ascertain which network(s) is impacted. Additionally, we noted that after an outage is remedied notice should be provided containing basic information on the actions taken by the affected service provider and the root cause of the outage.

Regional 9-1-1 directors and PSAPs were notified of the outage in various ways but primarily via email. Since emails are not always monitored, especially after hours, the preference is for phone calls. Moreover, the notices did not all come from the service provider but rather from an agent/contractor of the service provider or contractor of a 9-1-1 Entity. As a result, some PSAPs assumed the outage was within the 9-1-1 Entity's network. While this may be in

accordance with regulations or contractual requirements, the lack of context information serves to exacerbate any confusion.

The substance of the notice is of far greater importance, *i.e.,* does the notice contain reliable and actionable information including, but not limited to, time of the outage, geographic and network scope, initial or subsequent notice—and when the next update will be sent, on whose behalf the notice is being provided, a cause, and if a trouble ticket was started.[1] Of almost equal importance is that if multiple entities are providing notice that the outage and resolution notices be consistent and standardized to avoid furthering the confusion, beginning with that notifications should be sent within thirty minutes of discovery of the outage by the affected service provider. The foregoing should be addressed in the near future. (See enclosure of CSEC ALI-LVF Notification-Escalation Guidelines.)

Public Notification:
Public notification varied by PSAP, but generally the PSAPs used a variation of social media, local media, and emergency management personal to get the message out to the public. Some PSAPs did report an increase in call volume on their 10-digit numbers, however, they were unsure of the causation.

We support providers sending a text to customers when 9-1-1 service is unavailable, but the text needs to be geographically specific and limited to avoid undue unrest by the public. Additionally, the text could inform end users to dial their local PSAPs published 10-digit number.

The *Ex Parte* was conducted and is being filed pursuant to the Commission's permit-but-disclose proceedings rule (47 C.F.R. §1.1206). Should you have any questions, please contact the undersigned.

Respectfully submitted,

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Enc: 2
CSEC ALI-LVF Incident Notification;
FCC PSHSB Outage Questions

CC (via email):
Megan Henry
James Wiley
Tyler Di Mattia
Jim Goerke
Richard Muscat

[1] CSEC and its stakeholders are able to start trouble tickets at AT&T NOC that are then monitored. This process allows for vendor/network assessment of the issue, as well as gives valuable detail to the affected entities resulting in better public notification.

Questions on the Mar. 8 AT&T Mobility Outage

PSAP Notification:

- *Source*: How was your PSAP notified? By whom? Did a service provider or another entity provide you with subsequent updates regarding the status of the outage?
    - Is there any benefit to receiving notification from more than one service provider?
    - Is there any benefit to receiving notification directly from the service provider experiencing the outage, rather than another entity?
- *Format and Content*: In what format(s) did you receive notification(s) (*e.g.*, e-mail, phone)?
    - What is your preferred method of initial notification, and why? What is your preferred method of receiving subsequent updates?
    - What message content is most helpful to you during 911-only outages? During service-wide outages (which would include 911 outages but would also affect other services)? How could you use this information to improve public safety outcomes, for example, by staging first responder resources?
- *Time*: At what time(s) did you receive notification(s) about the outage?
    - What would you consider to be timely notification? Would it be sufficiently timely to receive notice 30 minutes from the time the service provider discovers the outage?
    - How would you balance providing notification that is fast with notification that is reliable (*i.e.*, we would anticipate that the sooner our rules require PSAP notification, the less information the notification might contain and the more likely that the notification might be a false alarm)?

Public Notification:

- *Tools and Content*: What tools did your PSAP use to provide notification to the public about this outage? What information did you provide?
    - What public notification content is most helpful during 911-only outages? During service-wide outages?
    - Are you concerned that notifying the public about outages using local media, social media, mass notification services and reverse 911 could create alert fatigue?
    - Do you use the Emergency Alert System or Wireless Emergency Alert system to provide public notifications during outages?
    - Were the measures that you employed during this and previous outages effective? How can you measure the public safety impact of public notification during outages?
- *Direct Public Notification*:
    - Should carriers provide notification directly to the public during 911-only outages? During service-wide outages? Should this be an alternative, or in addition to PSAP notification?

- During 911-only outages, could carriers provide alternative local emergency phone numbers using localized messaging? Do you already share your alternative 10-digit emergency phone numbers with service providers? If so, for what purpose?

Text-to-911:

- Does your PSAP support text-to-911?
  - If so, to what extent have you found that text-to-911 remains available during outages?
  - In your experience, does the availability of text-to-911 improve public safety outcomes during emergencies, and if so, how?

March 11th Outage: AT&T Mobility experienced a second VoLTE outage on March 11th. This outage affected all calls for VoLTE subscribers, including calls to 911.

- Do you have any information or concerns related to this outage?

Notification & Escalation Matrix Guidelines

INITIAL NOTIFICATION GUIDELINES						
Party/Group Notified		PSAP	Customer [2]		CSEC On Call	
Notification Method		Call[1]	E-Mail	Call [1]	E-Mail	Call
One-sided Impacts - ALI and Text-to-9-1-1						
Level 1	PSAP one sided		X		X	
Level 2	>10 PSAPs one-sided > 15 mins		X		X	
Level 3	>35 PSAPs one-sided > 15 mins		X	X	X	X
Level 4	All PSAPs one-sided within a Customer's region.		X	X	X	X
Hard-down Incidents - ALI and Text-to-9-1-1						
Level 1	PSAP hard down	X	X	X	X	
Level 2	>5 PSAPs hard down > 15 mins	X	X	X	X	X
Level 3	>18 PSAPs hard down > 15 mins	X	X	X	X	X
Level 4	All PSAPs hard down within a Customer's region.	X	X	X	X	X
Scheduled Maintenance						
	Wireline - 10 Day Notice		X		X	
Definition						
1)	Severity levels 1, 2, 3 and 4 criteria are determined by the number of affected PSAPs as indicated in the matrix above.					
2)	One side impacts – PSAP has a single sided network connection or connected to only one ALI node.					
3)	Hard down incidents - Total loss of connectivity between a PSAP and ALI database. PSAP is not receiving ALI data from either Router A or Router B.					
Footnotes:						
1)	Within 30 minutes upon verification of a total loss of connectivity between a PSAP and ALI database, Intrado shall complete a launch of an automated notification to affected PSAPs.					
2)	As defined in the Customer Service Contract, Customer = Texas 9-1-1 Administrative Agency					

Table 1: Initial Notifications

Notification & Escalation Matrix Guidelines

UPDATE/FINAL NOTIFICATION GUIDELINES										
Party/Group Notified		PSAP	Customer [3]		CSEC On Call		Conf Bridge	Update Frequency/Final [4]		
Notification Method		Call	E-Mail	Call	E-Mail	Call	Email	PSAP	Customer	CSEC
One-sided Impacts - ALI and Text-to-9-1-1										
Level 1	PSAP one sided		X		X			12 hr	12 hr	12 hr
Level 2	>10 PSAPs one-sided > 15 mins		X		X			12 hr	12 hr	12 hr
Level 3	>35 PSAPs one-sided > 15 mins		X		X			12 hr	12 hr	12 hr
Level 4	All PSAPs one-sided within a Customer's region		X		X			12 hr	12 hr	12 hr
Hard-down Incidents - ALI and Text-to-9-1-1										
Level 1	PSAP hard down	X	X	X	X			4 hr	2/4 hr [1]	2/4 hr [1]
Level 2	>5 PSAPs hard down > 15 mins	X	X	X	X			4 hr	2/4 hr [1]	2/4 hr [1]
Level 3	>18 PSAPs hard down > 15 mins	X	X	X	X	X	X [2]	4 hr	2/4 hr [1]	2/4 hr [1]
Level 4	All PSAPs hard down within a Customer's region.	X	X	X	X	X		4 hr	2/4 hr [1]	2/4 hr [1]
Definition										
1	Severity levels 1, 2, 3 and 4 criteria are determined by the number of affected PSAPs as indicated in the matrix above.									
2	One side impacts – PSAP has a single sided network connection or connected to only one ALI node.									
3	Hard down incidents - Total loss of connectivity between a PSAP and ALI database. PSAP is not receiving ALI data from either Router A or Router B.									
Footnotes:										
1)	Business hours - 2 hour update via email. All hours - 4 hour update via phone.									
2)	Intrado will open a customer conference bridge 2 hours into an incident for incidents involving systems within Intrado's care and control.									
3)	As defined in the Customer Service Contract, Customer = Texas 9-1-1 Administrative Agency.									
4)	Final notification to be provided ASAP following incident resolution.									

Table 2: Update/Final Notifications

Notification & Escalation Matrix Guidelines

ESCALATION GUIDELINES		
Escalation Level	**Intrado Group [1]**	**Interval**
1	NOC Operator	Immediate
2	NOC Management	1 Hour
3	On Call Program Manager (PM)	2 Hours
4	On Call PM Supervisor	3 Hours
5	Executive Management	4 Hours
Footnotes:		
1) Escalation points of contact to be provided annually or as changes occur.		

Table 3: Escalation Guidelines

Notification of Potential Service Disruption

Disruption Report Identifier	
Date of Disruption	
Date of Detection	
Date of Restoration	
Geographic Area and/or Application(s) affected	
Primary Contact /Tel	
Problem Description & Perceived Scope of Disruption	

Table 4: Incident Notification Template